

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BENEDICT VINCENT SOKOLOWSKI & : Case No.: 5:18-bk-03468-MJC

LYNDA JO SOKOLOWSKI

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: CHAPTER 13

OBJECTION TO MOTION TO INCUR DEBT

Pike County Tax Claim Bureau, a secured creditor in this case, objects to the Debtors' Motion to Incur Debt upon the following grounds:

1. Pike County Tax Claim Bureau is a secured creditor in the instant case.
2. Debtors have filed a motion seeking permission of the Honourable Court to incur debt for purchase of a new house and attached a copy of the proposed buyer's Closing costs, Agreement of Sale as exhibits.
3. The Motion to approve sale of their Pike County Residence (docket entry 85) , the motion contained a Seller's disclosure for the sale their Pike County residence which motion was approved by the Honourable Court at docket entry 100.
4. Under the terms of the instant Motion to Incur Debt Debtors state their new mortgage payment will be \$ 2,265.07 in contrast to their attached Exhibit A which states the \$2,265.07 is for principle and interest and an additional sum of \$279 for PMI and another sum of \$1,017 for estimated taxes, insurance and assessments which can increase over time, for an estimated monthly payment of \$3,561, an increase of more than 50%.
5. Debtors were scheduled to sell their Pike County property, thereby paying Pike Tax Claim for past due tax amounts on April 15, 2022.

6. That sale now seems to be scheduled for June 16, 2022 due to Debtors' requests to extend.
7. Debtors' motion does not state that they require the funds from the Pike County Sale to secure the New York Purchase.
8. In the event Debtors' purchase the New York house they may no longer have need for the Pennsylvania property and abandon same.
9. If the property is retaken and sold by auction or foreclosure the collectable tax amounts will be reduced causing harm to the creditor.

WHEREFORE, the Pike County Tax Claim Bureau humbly prays the Honourable Court deny the Debtors' instant request to incur debt.

Respectfully submitted,

s/ Mark E. Moulton
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